

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE a/k/a  
LATASHA TRANSRINA HOWARD and  
KEBE STUDIOS LLC,

Defendants.

Case No. 1:19-cv-01301-WMR

**PLAINTIFF’S MOTION  
FOR SUMMARY JUDGMENT AGAINST DEFENDANT KEBE**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Rule 56.1, Plaintiff Belcalis Marlenis Almánzar (“Plaintiff”) seeks summary judgment against Defendant Latasha Transrina Kebe (“Kebe”) as follows:

(1) Plaintiff seeks partial summary judgment on her claims for defamation *per se* (Counts I and III) finding as a matter of law that Kebe is liable and that Plaintiff is entitled to injunctive relief.<sup>1</sup>

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<sup>1</sup> Plaintiff also has asserted a claim for slander *per quod* (Count II). It would only become necessary to reach that claim if there is a finding that one or more

(2) Plaintiff seeks partial summary judgment on her claim for intentional infliction of emotional distress (Count V) finding as a matter of law that Kebe's conduct was (a) intentional or reckless and (b) extreme and outrageous.

(3) Plaintiff seeks summary judgment on each of Kebe's remaining counterclaims.

A proposed order is submitted with this motion, which is supported by the accompanying memorandum of law, declarations, and record in this case.

Dated: December 30, 2020

Respectfully submitted,

/s/ W. Andrew Pequignot

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statements is not slander *per se*. Plaintiff also has not moved on her invasion of privacy - false light claim (Count IV) and instead has reserved this claim for trial.

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*Attorneys for Plaintiff*

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 30, 2020, I electronically filed the foregoing PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT AGAINST DEFENDANT KEBE with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all of the attorneys of record

/s/ W. Andrew Pequignot  
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W. Andrew Pequignot